FILED
October 18, 2011
INDIANA UTILITY
REGULATORY COMMISSION

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

INFOTELECOM, LLO	C	)	
	Complainant,	)	
v.		)	Case No. 41268 INT 260 RD 01
Indiana Bell Telephone Company D/B/A AT&T Indiana		)	
	Defendant.	)	

## NOTICE OF BANKRUPTCY FILING AND SUGGESTION OF STAY

Plaintiff Infotelecom, LLC ("Infotelecom" or "Complainant") hereby notifies the Commission that on October 18, 2011, Infotelecom filed a petition for bankruptcy in the United States Bankruptcy Court for the Northern District of Ohio, being Case No. 11-18945. As a result of the filing of this bankruptcy action, the above-captioned case is subject to an automatic stay pursuant to the United States Bankruptcy Code.

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Counsel for Infotelecom, LLC

Dated: <u>October 18, 2011</u>

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following counsel and parties of record, this 18<sup>TH</sup> day of October, 2011, via first class United States mail, postage prepaid.

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# STATE OF ILLINOIS BEFORE THE ILLINOIS COMMERCE COMMISSION

INFOTELECOM, LLC	) ) )
Complainant,	)
v.	) Docket No. 11-0597
Illinois Bell Telephone Company D/B/A AT&T Illinois	) ) )
Defendant.	)

# NOTICE OF BANKRUPTCY FILING AND SUGGESTION OF STAY

Plaintiff Infotelecom, LLC ("Infotelecom" or "Complainant") hereby notifies the Commission that on October 18, 2011, Infotelecom filed a petition for bankruptcy in the United States Bankruptcy Court for the Northern District of Ohio, being Case No. 11-18945. As a result of the filing of this bankruptcy action, the above-captioned case is subject to an automatic stay pursuant to the United States Bankruptcy Code. See 11 U.S.C. Sec. 362.

Dated: October 18, 2011

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# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the parties listed on the service list maintained by the Clerk's Office of the Illinois Commerce Commission, this 18<sup>th</sup> day of October, 2011, via e-mail.

<u>Thomas H. Rowland</u> Attorney for Infotelecom, LLC



OF OHIO			RECEIVED
INFOTELECOM, LLC		OCT 18 PM	ED-DOCKETING DIV
Complainant,	)	կ։ 57	AIG DIA
v.	) Case No. 11-4887-TP-CSS		
Ohio Bell Telephone Company D/B/A AT&T Ohio	) ) )		
Respondent.	)		

# NOTICE OF BANKRUPTCY FILING AND SUGGESTION OF STAY

Infotelecom, LLC ("Infotelecom" or "Complainant") hereby notifies the Commission that on October 18, 2011, Infotelecom filed a petition for bankruptcy in the United States Bankruptcy Court for the Northern District of Ohio, being Case No. 11-18945. As a result of the filing of this bankruptcy action, the above-captioned case is subject to an automatic stay pursuant to the United States Bankruptcy Code.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

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Counsel for Pre-Petition Entity Infotelecom,

LLC

# **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was served by electronic mail on the following persons this 18<sup>th</sup> day of October, 2011.

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October 18, 2011

Ms. Mary Jo Kunkle Executive Secretary Michigan Public Service Commission 6545 Mercantile Way Lansing, MI 48911

Re: In the matter of the Complaint and Request for Emergency Relief of Infotelecom, LLC against Michigan Bell Telephone Company d/b/a AT&T Michigan MPSC Case No. U-16858

Dear Ms. Kunkle:

Attached please find Infotelecom, LLC's Notice of Bankruptcy Filing and Suggestion of Stay, in the above-captioned proceeding. Proof of Service upon the Parties of Record is also attached.

Very truly yours,

CLARK HILL PLC

Haran C. Rashes

HCR:pat
Attachment

cc: Parties of Record

#### **STATE OF MICHIGAN**

#### BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the Complaint and	)	
Request for Emergency Relief of	)	
Infotelecom, LLC against Michigan Bell	)	Case No. U-16858
Telephone Company d/b/a AT&T Michigan	)	

# INFOTELECOM, LLC'S NOTICE OF BANKRUPTCY FILING AND SUGGESTION OF STAY

Complainant Infotelecom, LLC ("Infotelecom") hereby notifies the Michigan Public Service Commission that on October 18, 2011, Infotelecom filed a petition for bankruptcy in the United States Bankruptcy Court for the Northern District of Ohio, being Case No. 11-18945, pending before Judge Jessica E. Price Smith. As a result of the filing of this bankruptcy action, the above-captioned case is subject to an automatic stay pursuant to the United States Bankruptcy Code.

Respectfully Submitted,

By:

Of Counsel: Ross A. Buntrock G. David Carter Arent Fox LLP 1050 Connecticut Ave, N.W. Washington, DC 20036-5339 Tel: (202) 857-6029 Fax: (202) 261-0035

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Attorneys For Infotelecom, LLC

7319208.1 37433/146258

Date: October 18, 2011

# **STATE OF MICHIGAN**

# BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

		* * * * *	
In the matter of the Complain Request for Emergency Relia Infotelecom, LLC against M Telephone Company d/b/a A	ef of Iichigan Bell	) ) ) )	Case No. U-16858
	PROOF	F OF SERVIC	<u>E</u>
STATE OF MICHIGAN COUNTY OF INGHAM	) ) ss. )		
Hill PLC, and that on Octo	ober 18, 2011, cay, in the above	copies of Infote- e-captioned pro-	says that he is an employee of Clark elecom, LLC's Notice of Bankruptcy oceeding, was served on those persons ervice First Class Mail.
		Leland	l R. Rosier
Subscribed and sworn to bef this 18 <sup>th</sup> day of October, 201			
Haran C. Rashes Notary Public, Washtenaw C Acting in Ingham County, M My Commission expires: Se	lichigan		

## Service List MPSC Case No. U-16858

# **Michigan Public Service Commission**

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#### <u>Infotelecom, LLC</u>

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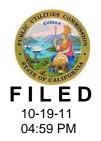
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7319330.1 37433/146258

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



Infotelecom, LLC (U6946C)

Complainant,

v.

Pacific Bell Telephone Company d/b/a AT&T California (U1001C),

Defendant.

C.11-07-021

# INFOTELECOM, LLC'S MOTION FOR STAY OF ALL PROCEEDINGS; NOTICE OF COMPLAINANT OF INSTITUTE OF BANKRUPTCY PROCEEDING

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Email: tmacbride@goodinmacbride.com

Attorneys for Complainant Infotelecom, LLC

Dated: October 19, 2011

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

	Infotelecom,	LLC	(U6946C)
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Complainant,

v.

Pacific Bell Telephone Company d/b/a AT&T California (U1001C),

Defendant.

C.11-07-021

# INFOTELECOM, LLC'S MOTION FOR STAY OF ALL PROCEEDINGS; NOTICE OF COMPLAINANT OF INSTITUTE OF BANKRUPTCY PROCEEDING

Infotelecom, LLC ("Infotelecom" or "Complainant") hereby notifies the Commission that on October 18, 2011, Infotelecom filed a petition for bankruptcy in the United States Bankruptcy Court for the Northern District of Ohio, being Case No. 11-18945. As a result of the filing of this bankruptcy action, the above-captioned case is subject to an automatic stay pursuant to the United States Bankruptcy Code.

Accordingly, pursuant to Rule 11.1 of the Commissions Rules of Practice and Procedure, Complainant Infotelecom, LLC hereby moves that all proceedings in this docket be stayed until further order of the Commission.

#### **BACKGROUND**

On July 25, 2011, Infotelecom, LLC's ("Infotelecom") instituted the above-captioned proceeding to (1) seek resolution of disputes between, Infotelecom and Pacific Bell Telephone Company d/b/a/ AT&T California ("AT&T") and (2) enjoin AT&T from taking any action to disconnect service to Infotelecom pending resolution of that dispute. No hearings have been held in this matter nor has a scoping memo been issued.

#### BANKRUPTCY PROCEEDINGS

On October 18, 2011, , Infotelecom filed a petition seeking protection under Chapter 11 of the Bankruptcy Act 11 U.S.C.A.Section 1101 *et seq*. Pursuant to Section 362 of the Bankruptcy Code (5 U.S.C.A 362) all actions to recover sums allegedly due from the bankruptcy petitioner are stayed.

While Infotelecom is the Complainant rather than the Defendant herein, continued proceedings before this Commission place burdens on Infotelecom of the nature precluded by Section 362. Accordingly, Infotelecom requests that all activity in this docket be stayed until further order of the Commission.

#### CONCLUSION

Because of the pendency of the proceedings in the Bankruptcy Court, it is appropriate for the Commission to stay any further action in this matter. Infotelecom will apprise the assigned Administrative Law Judge of the status of the bankruptcy proceeding within sixty (60) days.

#### Respectfully submitted this 19th day of October 2011, at San Francisco,

#### California.

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By /s/ Thomas J. MacBride, Jr.

Thomas J. MacBride, Jr.

Attorneys for Complainant Infotelecom, LLC

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Control Number: 39700



Item Number: 33

Addendum StartPage: 0

# INFOTELECOM, LLC OCTOBER 18, 2011

# **DOCKET NO. 39700**



PETITION OF INFOTELECOM, LLC	§	
AGAINST SOUTHWESTERN BELL	§	BEFORE THE
TELEPHONE COMPANY D/B/A	§	
AT&T TEXAS FOR POST-	§	PUBLIC UTILITY COMMISSION
INTERCONNECTION DISPUTE	§	
RESOLUTION AND REQUEST FOR	§	OF TEXAS
INTERIM RULING REGARDING	§	
UNLAWFUL ESCROW DEMAND	§	

# NOTICE OF BANKRUPTCY FILING AND SUGGESTION OF STAY

#### TO THE HONORABLE ARBITRATORS:

Petitioner Infotelecom, LLC ("Infotelecom") hereby notifies the Arbitrators that on October 18, 2011, Infotelecom filed a petition for bankruptcy in the United States Bankruptcy Court for the Northern District of Ohio to reorganize under Chapter 11, being Case No. 11-18945. As a result of the filing of this bankruptcy action, the above-captioned case is subject to an automatic stay pursuant to the United States Bankruptcy Code.

Accordingly, the procedural schedule is stayed and Infotelecom asks that the Arbitrators issue an order abating this proceeding.

Susan C. Gentz

State Bar No. 07803500

**Brad Bayliff** 

State Bar No. 24012260

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Carter.david@arentfox.com

Counsel for Infotelecom, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Notice has been served electronically on counsel for AT&T Texas on this 18th day of October, 2011.

Susan C. Gentz